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| 61:25-62:6 | 36:17 | 36:9-13 | 35:15-36:6 | | | | Page/Line Cite | | | - |
|--|-------|--|--|--------|---|--|---|---|---|--|
| Incomplete to the extent the designation does not make clean it relates to | | | | | | are included. Plaintiffs are attempting to show that Mr. Omole's job required regular contact with the U.S., which the completeness designations show is untrue. FRE 106, 401-403. | Defendants' Objections and Counter-Designations | | PLAINTIFES' OCTOBE | The American Company |
| | | | | | | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | (Counter-Designations in italicized text) Deposition September 1 & 2, 2005 | PLAINTHES' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF SOLA OMOLE (Testifying By Way of Deposition Only) | |
| 61:17-24 | | | · | 37:1-4 | 34:19-35:4 (completeness designation) | 32:24-33:4 (completeness designation) | Defendants' Cross- Examination Designations | ounter-Designations in italicized te Deposition September 1 & 2, 2005 | of Deposition O | |
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| | 66:1-66:17 (up to "recall") | 65:21 | 65:5-18 | | Page/Line Cite | | | | |
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| | Misleading and prejudicial because testimony is not about the Parabe incident and the jury is left to infer that it is. FRE 40 \ 403. | Misleading and prejudicial because testimony is not about the Parabe incident and the jury is left to infer that it is. FRE 401-403. | Misleading and prejudicial because testimony is not about the Parabe incident and the jugal left to infer that it is. PRE 401-403. | CNL personnel and follows discussion about COP public affairs personnel. FRE 106 | Defendants' Objections and Counter-Designations | | | | PLAINTIFFS' OCTOBER |
| | | | \bigcirc | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Deposition Septe | (Counter-Designations in italicized text) | (Testifying By Way of Deposition Only | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION |
| | | | 64:15-20 (completeness designation to make subject of question clear) | | Defendants' Cross- Examination Designations | Deposition September 1 & 2, 2005 | ons in italicized te | of Deposition On | OF DEPOSITIO |
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| ٠ | | | | | Defendants' Responses to Plaintiffs' Objections and Objections to Counter- Designations | | | | A OMOLE |

| 79:6-10 (except "that's described in exhibit 289") | | | 67:1-3 | 66:19 | Page/Line Cite | |
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| | | | Misleading and prejudicial because rettimony is not about the Parabe incident and the jury is left to infer that it is. FRE 401-403. | Misleading and prejudicial because testinory is not about the harabe incident and the jury is left to infer that it is. FRE 401-403. | Defendants' Objections and Counter-Designations | PLAINTIFFS' OCTOBE |
| | | | | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION TI (Testifying By Way of Deposition Only) (Counter-Designations in italicized text) Deposition September 1 & 2, 2005 |
| | 78:23-79:5 | 76:4-5 Exhibit 289 | | | Defendants' Cross- Examination Designations | DESIGNATION OF DEPOSITION Stifying By Way of Deposition On Dunter-Designations in italicized to Deposition September 1 & 2, 2005 |
| | | | | | Plaintiffs' Objections and Counter- Designations | N TESTIMONY OF SOLA OMOLE dy) ext) |
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| | 96;8-14 | 91:2-9 | 85:1-8 | 84:13-19 | 84:6-10 (except "in the document") | 80:18-81:7 | | Page/Line Cite | | | |
| (| Speculation. FRE 602. Hearsay. FRE 802. Question is argumentative and inaccurately summarizes testimony. FRE (401-403. | | | P COLUMN TO THE | Speculation. FRE 602. Exclusion of reference to the document of misleading and confusing. FRE 401-403. | 0 | | Defendants' Objections and Counter-Designations | | | PLAINTIFFS' OCTOBE |
| | 8.10 | | | | | | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Deposition September 1 & 2, 2005 | (Testifying By Way of Deposition Only) | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF SOLA OMOLE |
| | X | | | | | | 79:20-80:5 | Defendants' Cross- Examination Designations | Deposition September 1 & 2, 2005 | of Deposition Or | OF DEPOSITIO |
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| 115:1-6 | 114:2-17 | 111:25- 112:14, and Exh. 86 | 96:23-97:4 | 96:18 | Page/Line Cite | | |
| Speculation and question is vague. FRE 401-403, | Lacks foundation. FRE 602. There is no foundation or evidence that deponent knows the laws of Nigeria. Talls for an improper legal opinion. FRE 701-702. | 112:6-14: Speculation FRE 602. | Examiner is testifying and it is misleading and prejudicial. Obestion is argumentative and assumes facts not in evidence. FRE 401-403. | Incomplete designation. The war as De | Defendants' Objections and Counter-Designations | | PLAINTIFFS' OCTOBE |
| | | | | S Novem added | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | (Counter-Designations in italicized text) Deposition September 1 & 2, 2005 | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION 7 (Testifying By Way of Deposition Only) |
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| | 120:1-4 | | | 116:18-117:2 | | Page/Line Cite | | | |
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| | | | Plaintiffs are attempting to use the deponent's confusion in a misleading manner. There is no dispute that the CBL-101 bange was at Parabe during the March 1998 Itsekiri takeover. FRE 401-403. | Speculation and deponent lacks foundation. FRE 602. | 602. | Defendants' Objections and Counter-Designations | | | PLAINTIFFS' OCTOBE |
| | | | | | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Deposition September 1 & 2, 2005 | (Testifying By Way of Deposition Only) | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF SOLA OMOLE |
| 120:5-18 (completeness designation) | | 118:8-20 | , | | | Defendants' Cross- Examination Designations | mber 1 & 2, 2005 | of Deposition On | OF DEPOSITIO |
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| | | Objections to Counter- Designations | Examination Designations | Designations | Objections to Counter- Designations |
| 120:19-22 | Answers incomplete. | | | | |
| | | 0) | 120:23 (completeness designation) | | |
| 120:25-121:2 | | | | | |
| | | | 121:3-10 (completeness designation) | · | |
| 121:13-16 | | | | | Try man min and activities activities activities activities and activities activ |
| | D | 0 | 121:17-18 (completeness designation) | | |
| 121:22-24 | Incomplete RE 106. | | | · | |
| 122:15-25 | 2 | | | | |
| 124:2-12, | | | | Total Control of the | |
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| 15-17, and Exh. 85 | | | | | |
| | | | 124:13 | | |
| | | | 125:6-13 | | |
| 125:14-17 | | | | | |
| | | | 125:18-20 | | |
| | | | 126:16-23 | | |
| 128:2-25 | 128:7-15: Calls for speculation and deponent lacks foundation for what the MILAD meant its letter. FRE-401-403,602. | | | | |
| 129:20-23 | | The property of the second sec | | | |
| 130:1-3 and Exh. 291 | | | | | |
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| | | | | Incomplete designation. | Incomp FRE 10 | 140:8-11 and Exh. 295 |
|--|--|---|---|--|---|---|
| | | | | The exhibit is double hearsay. FRE 802, 805. Deponent has not laid a foundation for the document FRE 602. | The exhib hearsay. I Deponent foundation document | 137:16-19 and Exh. 294 |
| | | | | ~ | ÷ | 132:23 (beginning with "Did")- 133:9 |
| | | 132:19-22 | | | _ | |
| | | | | Speculation. FRE 602. 131:15-16, 131:20-22: Counsel is just reading the document into the record. The document is the best evidence of what it says. FRE 4002. | Speculation 131:15-16 Counsel is document The document evidence free 4002 | 131:15-132:1 |
| Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations | Plaintiffs' Objections and Counter- Designations | Defendants' Cross- Examination Designations | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Defendants' Objections Pand Counter-Designations O | Defend and Cov | Page/Line Cite |
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| | | was rephrased TKE 106, | |
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| | | 20 | 157:24-158:1 |
| 156:23-157:3 | | | |
| | | Testimony about deponent's lack of knowledge is intelevant and misseading. FRE 401-406 | 142:16-19 |
| 141:10-18 | | | |
| | | Counsel & comments are not evidence. FRE 401-403. | 141:6-8 |
| | | Incomplete, nonresponsive and confusing. FRE 106, 401-403. | 140:24-141:2 |
| Defendants' Plaintiffs' Objections Cross- and Counter- Examination Designations Designations | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Defendants' Objections and Counter-Designations | Page/Line Cite |
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| | 207:8-14 | | 202:19- 203:25 | 190:25-191:2 | 190:5-13 | 188:18-23 | Page/Line Cite | THE PARTY OF THE P | | |
| (| Misleading and prejudicial, Rlainuffs are designating a small portion of testimony | | 203:20-25: Speculation. FRE 602 | Asked and answered and speculation. IFRE 101-403, 602 | 190:5-10: Comsel is reading from the document and the document is the test evidence of what it says. FRE 1002. | Speculation. JRE 402. | Defendants' Objections and Counter-Designations | | | PLAINTIFFS' OCTOBE |
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| | | 205:3-19 (completeness designation) | | | | | Defendants' Cross- Examination Designations | Deposition September 1 & 2, 2005 | ons in italicized to | OF DEPOSITIO |
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| | relating to Akure to mislead the jury to believe that deponent's trip to Akure was related to the | | Land and the second sec | | |
| | the completeness designations make clear, the deponent's trip to Akure was related to | | | | |
| | with the Ilaje through the Military Administrator. FRE 401-403. | | | | |
| | | NO (| 207:15-208:4 (Completeness designation) | | |
| 208:5-6 | Misleading and prejudicial. Plaintiffs are designating a small | | | | |
| | portion of testimony | | | | |
| | mislead the jury to believe | | | | |

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| 210:20- 211:17 | 208:24-210:9 | 208:14-15 | | | Page/Line Cite | | | |
| 210:20-211:6: There is no question designated. FRE 106. It the question was designated, the response is | | | | that deponent's trip to Akure was related to the detention in Akure. As the completeness designations make clear, the deponent's trip to Akure was related to continued negotiations with the llaje through the Military Administrator. FRE 401-403. | Defendants' Objections and Counter-Designations | | PLAINTIFFS' OCTOBE | |
| | | | | | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | (Counter-Designations in italicized text) Deposition September 1 & 2, 2005 | PLAINTIFFS' OCTOBER 14, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF SOLA OMOLE (Testifying By Way of Deposition Only) | |
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| | | | | Argumentative and improper summary of | 291:17-21 |
| | | | | 224:24-225;3 Lacks foundation spatial ation. FRE 602. | 224:15-225:3 |
| | | 224:14 | | | |
| | | 224:3-9 | | | |
| | | | | | 223:23 (beginning at "what")-224:2 |
| | | | | | 223:10-21 |
| | | | | | 212:15-20 |
| | | 211:18-212:10 | | | |
| | | | | not responsive to the question and should be stricken. FRE 401-403. | |
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| | testimony. Assumes facts not in evidence that there were regular communications. | | Construction of the second of | | |
| | Irrelevant because | | | | |
| | period after Parabe. FRE 401-403. | | | | |
| 291:23 | | | | | |
| | | | 357:12-24 | | |
| 376:15 (starting with "Do you") -17 | Deponent is speculating. As the prior testimony makes clear, deponent was | | | | |
| | not involved in the negotiations Mr. Haastrup | | | | |
| | attempting to mislead the jucy that the 10 million | | | | |
| | naira ransom was for | | | | |
| | expenses of the takeover. | | | | |

| | | | | Deponent is speculating. | 376:24-377:3 |
|--|--|---|--|---|----------------|
| | | | | As the prior testimony makes clear, deponent was not involved in the negotiations, Mr. Haastrup was: Plaintiffs are attempting to mislead the jury that the 10 million naira ranson was for expenses of the takeover. The trial testimony reflects that the CIC made demands up to 100 million naira, for far more than expenses. FRE 401-403, 602. | 376:19-21 |
| | | | | reflects that the CIC made demands up to 100 million naira, for far more than expenses. FRE 401-403, 602. | |
| Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations | Plaintiffs' Objections and Counter- Designations | Defendants' Cross- Examination Designations | Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations | Defendants' Objections and Counter-Designations | Page/Line Cite |
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| 396:3 (starting with "Did") -17 | | Page/Line Cite |
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| | As the prior testimony makes clear, deponent was not involved in the negotiations, Mr. Haastrup was. Plaintiffs are attempting to mislead the jury that the 10 million raira ransom was for expenses of the taxeover. The trial testimony reflects that the CIC made demands up to 100 million naira, for far more than expenses. FRE 401-403, 602. Asked and answered, argumentative. FRE 401-403. | PLAINTIFFS' OCTOBE |
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